

David C. Parisi (162248)
Suzanne Havens Beckman (188814)
PARISI & HAVENS LLP
212 Marine Street, Suite 100
Santa Monica, California 90405
(818) 990-1299 (telephone)
(818) 501-7852 (facsimile)
dcparsi@parisihavens.com
shavens@parisihavens.com

Ethan Preston (263295)
PRESTON LAW OFFICES
4054 McKinney Avenue, Suite 310
Dallas, Texas 75204
(972) 564-8340 (telephone)
(866) 509-1197 (facsimile)
ep@eplaw.us

*Attorneys for Plaintiff John Lofton, on his own
behalf, and behalf of all others similarly situated*

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

JOHN LOFTON, an individual, on his own
behalf and on behalf of all others similarly
situated,

Plaintiff,

v.

VERIZON WIRELESS (VAW) LLC, and
DOES 1-100, inclusive,

Defendants.

No. C 13-05665 YGR

Honorable Yvonne Gonzalez Rogers
Honorable Jacqueline Scott Corley

**NOTICE OF MOTION AND
PLAINTIFF JOHN LOFTON'S
UNOPPOSED MOTION FOR
ATTORNEY'S FEE AWARD AND
CLASS REPRESENTATIVE'S
INCENTIVE AWARD**

Date: May 24, 2016
Time: 2:00 p.m.
Location: Courtroom 1
Ronald V. Dellums Federal Bldg.
1301 Clay Street
Oakland, California 94612

**NOTICE OF MOTION FOR ATTORNEY'S FEE AWARD
AND CLASS REPRESENTATIVE'S INCENTIVE AWARD**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD: PLEASE TAKE
NOTICE THAT on May 24, 2016 at 2:00 p.m., in Courtroom 1 in the Ronald V. Dellums
Federal Building at 1301 Clay Street, Oakland, California 94612, before the Honorable Judge
Yvonne Gonzalez Rogers, Plaintiff John Lofton ("Lofton") will and hereby does move for an
award of attorneys' fees for Parisi & Havens LLP and Preston Law Offices (in the amount of
\$1.35 million), counsel's expenses (totaling \$40,990.11), and an incentive award for Lofton (in
the amount of \$15,000) from the common fund established under parties' settlement agreement,
pursuant to Rule 23(h) of the Federal Rules of Civil Procedure.

**MOTION FOR ATTORNEY'S FEE AWARD AND
CLASS REPRESENTATIVE'S INCENTIVE AWARD**

This Motion is based on this Notice of Motion and Motion, the Memorandum of Points
and Authorities in Support of the Motion, the authorities cited therein and the supporting
declaration, the attached Settlement, Plan of Allocation, the Notice (including Website Notice,
Direct Notice, and Publication Notice), and the proposed Orders for Preliminary and Final
Approval, the oral argument of counsel, and any other matter that may be submitted at the
hearing. Further, this Motion is made on the grounds that the Settlement is the product of arm's-
length, good-faith negotiations; is fair, reasonable, and adequate to the Class, and should be
preliminarily approved, as discussed in the attached memorandum.

Dated: April 14, 2016

By: /s/David C. Parisi
David C. Parisi (162248)
Suzanne Havens Beckman (188814)
PARISI & HAVENS LLP
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Santa Monica, California 90405
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